

efforts to collect, review, and produce a massive amount of electronically stored information—a process which has already been costly and time-consuming. (*Id.* at 3.) If amendment were allowed, Kerry also would need to issue extensive additional written discovery requests to OPC regarding the new allegations. At the same time, OPC is insistent that the parties quickly move forward with discovery over the holidays. In summary, because discovery is continuing unabated, Kerry respectfully submits that it is in the interests of both parties, as well as the Court's administration of this case, that the scope of OPC's claims, and hence discovery, be determined as soon as possible. For all of these reasons, the request for extension either should be denied or the Court should grant a shorter extension of time than the extension OPC has requested.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2020 a copy of the foregoing was filed electronically, and that notice of this filing will be sent to registered parties by operation of the Court's electronic filing system.

/s/ Peter J. Kocoras

Peter J. Kocoras